

**Congressman Rick Boucher**

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COMMISSION MAIL ROOM

JUL 6 12 26 PM '98



**P.O. Box 2000  
Abingdon, Virginia 24212  
June 25, 1998**

Ms. Kelli McCarthy, Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: 12 Day Pre-Primary Report (4/1/98 - 5/17/98)

Dear Ms. McCarthy:

Thank you for your letter of June 19, 1998 concerning the Boucher for Congress Committee's 12 Day Pre-Primary Report.

With regard to the Committee's receipt of two contributions from political action committees (PACs) which were sent to us through incorporated businesses, please be advised that both contributions have been refunded to the PACs. I have enclosed a copy of the refund checks and accompanying letters which were sent to the contributing PACs. Pursuant to the Act, each refund will appear on the Committee's July 15 Quarterly Report, the period in which the refunds were made.

I appreciate your taking the time this past Wednesday, June 24, to clarify the federal campaign regulations as they apply to conduits. Until that time, I mistakenly believed that a corporation was a conduit only if a contribution intended for a federal campaign was deposited into its treasury and then reissued to the campaign. In the two particular instances involving the Committee, I presumed that it was an allowable contribution since the corporation(s) simply passed the check(s) along with a cover letter. This situation will not arise in the future.

Concerning the Committee's receipt of an apparent excessive contribution from an individual, it is my understanding that the Federal Election Commission is aware that the Committee is still within its 60 day period allowed under the Act to remedy the situation. I appreciate your consideration of the documents which are attached to the Campaign's 12 Day Pre-Primary Report: Statement Attachments (2 pages) which follow Schedule A Line 11(a)(i) are directly related to this matter.

For your records and information, however, please be advised that the Campaign today has issued a refund of the excessive portion of this particular individual's contribution because we have not received a response from the contributor. A copy of the refund check and accompanying letter are also enclosed.